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7 Disney Enterprises, Inc., Warner Bros.
Entertainment Inc. and DC Comics

8
9 UNITED STATES DISTRICT COURT
10 CENTRAL DISTRICT OF CALIFORNIA

11 Sanrio, Inc., Disney Enterprises, Inc.,
12 Warner Bros. Entertainment Inc. and DC
Comics,

13 Plaintiffs,

14 v.

15 World Wide Watches, Inc., Ajaz Ramzan
16 a/k/a Ajaz Razman, Shaheroz Peredina
17 a/k/a Shaeroz Ramzan, and Does 1 – 10,
inclusive,

18 Defendants.

Case No. **CV09-07116 MRP (SSx)**

COMPLAINT FOR COPYRIGHT
INFRINGEMENT; TRADEMARK
INFRINGEMENT; UNFAIR
COMPETITION; TRADEMARK
DILUTION; DECLARATORY
RELIEF

DEMAND FOR A JURY TRIAL

19
20 Plaintiffs Sanrio, Inc. ("Sanrio"), Disney Enterprises, Inc. ("Disney"), Warner
21 Bros. Entertainment Inc. ("Warner Bros.") and DC Comics (collectively "Plaintiffs")
22 for their Complaint allege as follows:

23 **Allegations Common to All Claims for Relief**

24 **A. Jurisdiction and Venue**

25 1. The claims for trademark infringement, unfair competition and
26 trademark dilution under the Lanham Trademark Act, as amended, 15 U.S.C., § 1051
27 *et seq.*, allege the unauthorized use in interstate commerce of famous and distinctive
28 marks, false designations of origin and trademark dilution. The Court has

1 jurisdiction over the subject matter of these claims pursuant to 15 U.S.C. § 1121 and
2 28 U.S.C. § 1331 and § 1338. The cause of action for copyright infringement arises
3 pursuant to 17 U.S.C. § 101, *et seq.* The Court has jurisdiction over the subject
4 matter pursuant to 28 U.S.C. § 1331 and § 1338(a). The remaining causes of action
5 for unfair competition and trademark dilution under California state law and for a
6 constructive trust arise under the laws of the State of California. The Court has
7 jurisdiction over these substantial and related claims pursuant to 28 U.S.C. § 1338
8 (b) and § 1367.

9 2. Venue in the Central District of California is proper pursuant to 28
10 U.S.C. § 1391(b), § 1392 and § 1400(a).

11 **B. Introduction**

12 3. This case concerns the concerted, systematic and wholesale theft of
13 various world-famous intellectual properties owned by Plaintiffs. Defendants are
14 engaged in the manufacture, importation, distribution, promotion, sale and offer for
15 sale of watches, keychains and other personal accessories, which incorporate
16 unauthorized likenesses of animated or live action characters or other logos owned
17 by Plaintiffs, including, but not necessarily limited to, Hello Kitty, Minnie Mouse,
18 Buzz Lightyear (from the motion picture *Toy Story*), Hannah Montana (from the
19 television series *Hannah Montana*), Jack Skellington (from the motion picture *Tim*
20 *Burton's The Nightmare Before Christmas*), Tweety Bird, and Superman
21 (collectively "Infringing Product").

22 **C. Plaintiff Sanrio**

23 4. Sanrio is a corporation, duly organized and existing under the laws of
24 California, having its principal place of business in South San Francisco. Plaintiff
25 Sanrio is and, at all relevant times, has been, the exclusive U.S. licensee of Sanrio
26 Company, Ltd., a Japan corporation ("Sanrio Co."). Plaintiff Sanrio is a wholly-
27 owned subsidiary of Sanrio Co.
28

1 5. For more than forty years, Sanrio Co. has been engaged in the business
2 of manufacturing, distributing and selling a wide range of products including,
3 without limitation, character artwork created, developed and designed by Sanrio Co.
4 for use by children and young adults. Certain of the characters and designs have
5 achieved such global fame and popularity that Sanrio Co. has produced and
6 distributed television programming for children based on the character artwork. One
7 such television program is the animated television series entitled *Hello Kitty*.

8 6. A significant source of revenue for Sanrio Co. is the merchandising and
9 licensing of distinctive elements bearing character artwork, including Hello Kitty,
10 Bad Badtz Maru, Chococat, KeroKeroKeroppi, Landy, Little Twin Stars, Monkichi,
11 My Melody, Patty and Jimmy, Pekkle, Picke Bicke, Pochacco, Tuxedo Sam,
12 Winkipinki and Zashikbuta (hereinafter individually and collectively referred to as
13 the "Sanrio Co. Characters").

14 7. The revenue from products using the Sanrio Co. Characters sold in the
15 United States is substantial. The appearance and other features of the Sanrio Co.
16 Characters are inherently distinctive and serve to identify Sanrio as the source of
17 products bearing the Sanrio Co. Characters. The design, configuration and
18 distinctive features of the Sanrio Co. Characters and other Sanrio Co. copyrighted
19 works, and of works related thereto (hereinafter individually and collectively referred
20 to as "Sanrio Co.'s Copyrighted Designs") are wholly original with Sanrio Co. and,
21 as fixed in various tangible media, including, without limitation, merchandise, are
22 copyrightable subject matter under the United States Copyright Act, 17 U.S.C., §§
23 101 *et seq.* Sanrio Co. is the owner of Sanrio Co.'s Copyrighted Designs and, as
24 featured on and in connection with various merchandise, these designs constitute
25 copyrightable subject matter under the Copyright Act of 1976, 17 U.S.C. §§ 101, *et*
26 *seq.*

27 8. Sanrio Co. has complied in all respects with the laws governing
28 copyright and has secured the exclusive rights and privileges in and to the copyrights

1 to Sanrio Co.'s Copyrighted Designs, and Sanrio Co. owns one or more certificates
2 of registration for works in which each of Sanrio Co.'s Copyrighted Designs appear.
3 A representative list of copyright registrations for Sanrio Co.'s Copyrighted Designs
4 is attached hereto as Exhibit A.

5 9. Products featuring Sanrio Co.'s Copyrighted Designs manufactured,
6 sold and distributed by Sanrio Co. or under its authority have been manufactured,
7 sold and distributed in conformity with the provisions of the copyright laws. Sanrio
8 Co. and those acting under its authority have complied with their obligations under
9 the copyright laws and Sanrio Co. has at all times been and still is the sole proprietor
10 or otherwise authorized to enforce all right, title and interest in and to the copyrights
11 in each of Sanrio Co.'s Copyrighted Designs.

12 10. Sanrio Co. owns all right, title and interest in and to and holds exclusive
13 right to develop, manufacture, market and sell products bearing the trademarks, trade
14 names, service marks, artwork, characters and other distinctive elements for and
15 incorporating the Sanrio Co. Characters in the United States.

16 11. Sanrio Co. is the owner of world famous registered marks which serve
17 to distinguish Sanrio Co. products. Some of those trademarks have been used
18 continuously for over twenty-five years. Each year, Sanrio Co. spends millions of
19 dollars to develop and maintain the considerable good will it enjoys in its trademarks
20 and in its reputation for high quality. A representative list of trademark registrations
21 for the Sanrio Co. Characters is attached hereto as Exhibit B (collectively "Sanrio
22 Co.'s Trademarks").

23 12. Sanrio Co.'s Trademarks are all valid, extant and in full force and
24 effect. Sanrio Co.'s Trademarks are all exclusively owned by Sanrio Co. Sanrio
25 Co. has continuously used each of Sanrio Co.'s Trademarks from the registration
26 date, or earlier, until the present and at all times relevant to the claims alleged in this
27 Complaint.
28

1 13. As a result of advertising and sales, together with longstanding
2 consumer acceptance, Sanrio Co.'s Trademarks identify Sanrio Co.'s products and
3 authorized sales of these products. Sanrio Co.'s Trademarks have each acquired
4 secondary meaning in the minds of consumers throughout the United States and the
5 world. The Sanrio Co. Characters, Sanrio Co.'s Copyrighted Designs and Sanrio
6 Co.'s Trademarks are collectively referred to herein as "Sanrio Co.'s Properties."

7 **D. Plaintiff Disney**

8 14. Disney is a corporation duly organized and existing under the laws of
9 the State of Delaware, having its principal place of business in Burbank, California.

10 15. Disney or one of its affiliated companies is engaged in a variety of
11 businesses including, without limitation, the operation of the Walt Disney World
12 resort complex and the Disneyland resort, producing and distributing motion pictures
13 and television programs, operating stores and hotels, publishing and selling books,
14 computer software, records and tapes, and providing entertainment services.

15 16. A significant aspect of Disney's business is the merchandising and
16 licensing of distinctive elements associated with its motion picture and television
17 programs. The distinctive elements licensed and/or merchandised by Disney
18 include, but are not limited to, the world-famous characters featured in numerous
19 animated short films, feature length motion pictures and television programs
20 produced over a period of more than seventy years, including, but not limited to,
21 Minnie Mouse, Buzz Lightyear (from the motion picture *Toy Story*), Hannah
22 Montana (from the television series *Hannah Montana* and related motion pictures)
23 and Jack Skellington (from the motion picture *Tim Burton's The Nightmare Before*
24 *Christmas*) (hereinafter individually and collectively referred to as the "Disney
25 Characters").

26 17. The revenue from products sold in the United States which use the
27 Disney Characters is substantial. The appearance and other features of the Disney
28 Characters are inherently distinctive and serve to identify Disney and its licensees as

1 the source of products bearing the Disney Characters. The design, configuration and
2 distinctive features of the Disney Characters and other Disney copyrighted works,
3 and of works related thereto (hereinafter individually and collectively referred to as
4 “Disney’s Copyrighted Designs”), are wholly original with Disney and, as fixed in
5 various tangible media, including merchandise, are copyrightable subject matter
6 under the United States Copyright Act, 17 U.S.C., Sections 101, *et seq.* Disney is
7 the owner of Disney’s Copyrighted Designs and, as featured on in connection with
8 various merchandise, constitute copyrightable subject matter under the Copyright
9 Act of 1976, 17 U.S.C. § 101, *et seq.*

10 18. Disney, and its predecessors in interest, including Walter E. Disney,
11 have complied in all respects with the laws governing copyright and have secured the
12 exclusive rights and privileges in and to the copyrights to Disney’s Copyrighted
13 Designs, and Disney owns one or more certificates of registration for works in which
14 each of Disney’s Copyrighted Designs appear. A representative list of copyright
15 registrations for Disney’s Copyrighted Designs is attached hereto as Exhibit C.

16 19. Products featuring Disney’s Copyrighted Designs which are
17 manufactured, sold and distributed by Disney or under its authority have been
18 manufactured, sold and distributed in conformity with the provisions of the copyright
19 laws. Disney and those acting under its authority have complied with their
20 obligations under the copyright laws, and Disney, in its own right or as successor-in-
21 interest, has at all times been and still is the sole proprietor or otherwise authorized
22 to enforce all right, title and interest in and to the copyrights in each of Disney’s
23 Copyrighted Designs.

24 20. Disney is the owner of world famous registered marks which serve to
25 distinguish Disney products (“Disney’s Trademarks”). Some of those trademarks
26 have been used continuously for over seventy years. Each year Disney spends
27 millions of dollars to develop and maintain the considerable goodwill it enjoys in its
28

1 trademarks and in its reputation for high quality. A representative list of trademark
2 registrations for Disney's Trademarks is attached hereto as Exhibit D.

3 21. Disney's Trademarks are all valid, extant and in full force and effect.
4 Disney's Trademarks are all exclusively owned by Disney. Disney has continuously
5 used each of Disney's Trademarks from the registration date, or earlier, until the
6 present and at all times relevant to the claims alleged in this Complaint.

7 22. As a result of advertising and sales, together with longstanding
8 consumer acceptance, Disney's Trademarks identify Disney's products and
9 authorized sales of these products. Disney's Trademarks have each acquired
10 secondary meaning in the minds of consumers throughout the United States and the
11 world. The Disney Characters, Disney's Copyrighted Designs and Disney's
12 Trademarks are collectively referred to herein as "Disney's Properties."

13 **E. Plaintiff Warner Bros.**

14 23. Warner Bros. is a corporation duly organized and existing under the
15 laws of the State of Delaware, having its principal place of business in Burbank,
16 California. Warner Bros., or one of its wholly-owned subsidiaries, is engaged in a
17 variety of businesses including, without limitation, the production, distribution and
18 broadcast of filmed entertainment, including motion pictures and television
19 programming.

20 24. A significant aspect of Warner Bros.' business is the merchandising and
21 licensing of distinctive trademarks and copyrights associated with its media product,
22 specifically including the *Looney Tunes* animated shorts. The distinctive trademarks
23 and copyrights licensed and/or merchandised by Warner Bros. include, but are not
24 limited to, the world-famous characters featured in such programming and films,
25 specifically including the character Tweety Bird (hereinafter individually and
26 collectively referred to as the "Warner Bros. Characters").

27 25. The revenue from products sold in the United States which use the
28 Warner Bros. Characters is substantial. The appearance and other features of the

1 Warner Bros. Characters are inherently distinctive and serve to identify Warner Bros.
2 and its licensees as the source of products bearing the Warner Bros. Characters. The
3 design, configuration and distinctive features of the Warner Bros. Characters and
4 other Warner Bros. copyrighted works, and of works related thereto (hereinafter
5 individually and collectively referred to as “Warner Bros.’ Copyrighted Designs”)
6 are wholly original with Warner Bros. and, as fixed in various tangible media,
7 including merchandise, are copyrightable subject matter under the United States
8 Copyright Act, 17 U.S.C., §§ 101, et seq. Warner Bros. is the owner of Warner
9 Bros.’ Copyrighted Designs and, as featured on in connection with various
10 merchandise, constitute copyrightable subject matter under the Copyright Act of
11 1976, 17 U.S.C. §§ 101, et seq.

12 26. Warner Bros. has complied in all respects with the laws governing
13 copyright and has secured the exclusive rights and privileges in and to the copyrights
14 to Warner Bros.’ Copyrighted Designs, and Warner Bros. owns one or more
15 certificates of registration for works in which each of Warner Bros.’ Copyrighted
16 Designs appear. A representative list of copyright registrations for Warner Bros.’
17 Copyrighted Designs is attached hereto as Exhibit E.

18 27. Warner Bros. and those acting under its authority have complied with
19 their obligations under the copyright laws, and Warner Bros. has at all times been
20 and still is the sole proprietor or otherwise authorized to enforce all right, title and
21 interest in and to the copyrights in each of Warner Bros.’ Copyrighted Designs.

22 28. Warner Bros. is the owner of world famous registered marks which
23 serve to distinguish Warner Bros. products. Each year Warner Bros. spends millions
24 of dollars to develop and maintain the considerable goodwill it enjoys in its
25 trademarks and in its reputation for high quality. A representative list of trademark
26 registrations for the Warner Bros. Characters is attached hereto as Exhibit F
27 (collectively the “Warner Bros. Trademarks”).
28

1 29. The Warner Bros. Trademarks are all valid, extant and in full force and
2 effect. Warner Bros. Trademarks are all exclusively owned by Warner Bros.
3 Warner Bros. has continuously used each of the Warner Bros. Trademarks from the
4 registration date, or earlier, until the present and at all times relevant to the claims
5 alleged in this Complaint.

6 30. As a result of advertising and sales, together with longstanding
7 consumer acceptance, the Warner Bros. Trademarks identify Warner Bros.' products
8 and authorized sales of these products. The Warner Bros. Trademarks have each
9 acquired secondary meaning in the minds of consumers throughout the United States
10 and the world. The Warner Bros. Characters, Copyrighted Designs and Trademarks
11 are collectively referred to herein as the "Warner Bros. Properties."

12 **F. Plaintiff DC Comics**

13 31. DC Comics is a New York General Partnership consisting of E.C.
14 Publications, Inc. and Warner Communications Inc., having its principal place of
15 business in New York, New York. DC is engaged in the business of publishing
16 comic magazines and is among the most well-known and successful publishers of
17 comic magazines in the world.

18 32. A significant aspect of DC Comics' business is the merchandising and
19 licensing of distinctive trademarks and copyrights associated with its highly
20 successful and well-known characters "Batman," "Superman," "Swamp Thing,"
21 "Wonder Woman" and "The Flash (hereinafter individually and collectively referred
22 to as the "DC Characters"). Of these, two of the most successful have been Batman
23 and Superman.

24 33. Batman first appeared in the May 1939 issue of "Detective Comics."
25 Numerous related characters, including "Robin," "The Riddler," "Two Face,"
26 "Catwoman," "The Penguin" and "The Joker" as well as other popular characters
27 associated with Batman were soon introduced to the public. (Batman and the related
28 characters are hereinafter collectively referred to as the "Batman Characters").

1 Superman appeared at least as early as 1938. Numerous related characters, including
2 "Clark Kent," "Lois Lane," and "Lex Luthor" as well as other popular characters
3 associated with Superman were soon introduced to the public. (Superman and the
4 related characters are hereinafter collectively referred to as the "Superman
5 Characters").

6 34. Since their introductions, the Batman and Superman Characters have
7 been featured in many formats including movie serials, newspaper comic strips,
8 radio shows, animated television series, live action television series, animated
9 motion pictures, live action motion picture and theatrical presentations, among
10 others. Television series featuring the Batman and Superman Characters have since
11 been in continuous television syndication in the United States and abroad from 1966
12 through the present. These appearances have expanded the popularity of the Batman
13 and Superman Characters beyond the comic book medium and market.

14 35. The Batman Characters have also been featured in numerous theatrical
15 motion pictures since their introduction. The most recent motion picture featuring
16 the Batman Characters, "The Dark Knight," was released on July 18, 2008, and has
17 generated over \$530 million dollars in domestic box office receipts and over \$465
18 million dollars in international box office receipts. Other motion pictures include
19 "Batman," "Batman Returns," "Batman Forever," and have resulted in domestic
20 gross box office in the millions of dollars, not to mention additional revenues from
21 syndication rights and home video distribution. "Batman" proved to be among the
22 most successful licensing and merchandising ventures of all time, with gross retail
23 sales of associated licensed merchandise exceeding \$1,000,000,000.

24 36. The Superman Characters have also appeared in numerous theatrical
25 motion pictures since their introduction. The most recent motion picture featuring
26 the Superman Characters, *Superman Returns*, was released on June 28, 2006, and has
27 generated over \$167 million dollars in domestic box office receipts and over \$77
28 million dollars in international box office receipts. The Superman Characters have

1 also been featured in numerous other theatrical motion pictures, including a series of
2 four motion pictures starring Christopher Reeve. Such motion pictures include
3 *Superman*, *Superman II*, *Superman III*, and *Superman IV The Quest for Peace*; and
4 have collectively generated over \$319 million dollars in domestic box office receipts
5 and over \$251 million dollars in international box office receipts.

6 37. The revenue from products using the DC Characters sold in the United
7 States is substantial. The appearance and other features of the DC Characters are
8 inherently distinctive and serve to identify DC Comics and its licensees as the source
9 of products bearing the DC Characters. The design, configuration and distinctive
10 features of the DC Characters and other DC Comics' copyrighted works, and of
11 works related thereto (hereinafter individually and collectively referred to as the "DC
12 Comics' Copyrighted Designs") are wholly original with DC Comics and, as fixed in
13 various tangible media, including, without limitation, merchandise, are copyrightable
14 subject matter under the United States Copyright Act, 17 U.S.C., §§ 101, et seq. DC
15 Comics is the owner of the DC Copyrighted Designs and, as featured on in
16 connection with various merchandise, these designs constitute copyrightable subject
17 matter under the Copyright Act of 1976, 17 U.S.C. §§ 101, et seq.

18 38. DC Comics has complied in all respects with the laws governing
19 copyright and has secured the exclusive rights and privileges in and to the copyrights
20 to the DC Comics' Copyrighted Designs, and DC Comics owns one or more
21 certificates of registration for works in which each of the DC Comics' Copyrighted
22 Designs appear. A representative list of copyright registrations for the DC Comics'
23 Copyrighted Designs is attached as Exhibit G.

24 39. Products featuring the DC Comics' Copyrighted Designs manufactured,
25 sold and distributed by DC Comics or under its authority have been manufactured,
26 sold and distributed in conformity with the provisions of the copyright laws. DC
27 Comics and those acting under its authority have complied with their obligations
28 under the copyright laws and DC Comics has at all times been and still is the sole

1 proprietor or otherwise authorized to enforce all right, title and interest in and to the
2 copyrights in each of the DC Comics' Copyrighted Designs.

3 40. DC Comics owns all right, title and interest in and to and holds
4 exclusive right to develop, manufacture, market and sell product bearing the
5 trademarks, trade names, service marks, artwork, characters and other distinctive
6 elements for and incorporating the DC Characters.

7 41. DC Comics is the owner of world famous registered marks which serve
8 to distinguish DC products. Each year DC Comics spends millions of dollars to
9 develop and maintain the considerable good will it enjoys in its trademarks and in its
10 reputation for high quality. A representative list of trademark registrations for the
11 DC Characters is attached as Exhibit H (collectively the "DC Comics' Trademarks"),
12 including, but not limited to, the trademark registration of the Superman "S" device
13 depicted below:



19 42. The DC Comics' Trademarks are all valid, extant and in full force and
20 effect. The DC Comics' Trademarks are all exclusively owned by DC Comics. DC
21 Comics has continuously used each of the DC Comics Trademarks from the
22 registration date, or earlier, until the present and at all times relevant to the claims
23 alleged in this Complaint.

24 43. DC has granted and transferred to its related companies, Warner Bros.
25 Consumer Products Inc., Warner Bros. Home Entertainment and WB Studio
26 Enterprises Inc., subsidiaries of Warner Bros., the right to supervise in the United
27 States the merchandising and licensing of the copyrighted elements, trademarks,
28

1 trade names and service marks incorporated in or associated with the DC Characters.
2 Currently, Plaintiffs have numerous active license agreements in the United States.
3 These agreements provide for the authorized use of the DC Characters on products
4 and in connection with services, including watches, key chains and other personal
5 accessories, among others.

6 44. As a result of advertising and sales, together with longstanding
7 consumer acceptance, the DC Comics' Trademarks identify DC Comics' products
8 and authorized sales of these products. The DC Comics' Trademarks have each
9 acquired secondary meaning in the minds of consumers throughout the United States
10 and the world. The DC Comics' Copyrighted Designs and the DC Comics'
11 Trademarks are collectively referred to herein as the "DC Comics' Properties."

12 45. Sanrio Co.'s Copyrighted Designs, Disney's Copyrighted Designs,
13 Warner Bros.' Copyrighted Designs and DC Comics' Copyrighted Designs are
14 collectively referred to herein as "Plaintiffs' Copyrighted Designs." Sanrio Co.'s
15 Trademarks, Disney's Trademarks, the Warner Bros. Trademarks and DC Comics'
16 Trademarks are collectively referred to herein as "Plaintiffs' Trademarks."
17 Plaintiffs' Copyrighted Designs and Plaintiffs' Trademarks are collectively referred
18 to herein as "Plaintiffs' Properties."

19 **G. Defendants**

20 46. Defendant World Wide Watches, Inc. ("WWW") is a California
21 corporation with its principal place of business in the city of Los Angeles, California.
22 WWW is subject to the jurisdiction of this Court and is manufacturing, promoting,
23 distributing, advertising and selling merchandise which infringes Plaintiffs'
24 Properties within this judicial district.

25 47. Defendant Ajaz Ramzan a/k/a Ajaz Razman ("Ramzan") is an
26 individual and a resident of the County of Los Angeles and State of California.
27 Plaintiffs are informed and believe, and upon that basis allege, that Ramzan does
28 business as WWW in the City of Los Angeles, California. Plaintiffs are further

1 informed and believe, and based thereon allege, that Ramzan had the right and ability
2 to supervise or control the infringing activity alleged herein and that he had a direct
3 financial interest in such activity. In addition or alternatively, Defendant Ramzan
4 had knowledge or reason to know of the infringing activity and took actions which
5 contributed to such activity.

6 48. Defendant Shaheroz Peredina a/k/a Shaeroz Ramzan ("Peredina") is an
7 individual and a resident of the County of Los Angeles and State of California.
8 Plaintiffs are informed and believe, and upon that basis allege, that Peredina does
9 business as WWW in the City of Los Angeles, California. Plaintiffs are further
10 informed and believe, and based thereon allege, that Peredina had the right and
11 ability to supervise or control the infringing activity alleged herein and that he had a
12 direct financial interest in such activity. In addition or alternatively, Defendant
13 Peredina had knowledge or reason to know of the infringing activity and took actions
14 which contributed to such activity.

15 49. Upon information and belief, Does 1 – 10 are either entities or
16 individuals who are residents of or present in this judicial district, and are subject to
17 the jurisdiction of this Court. Upon information and belief, Does 1 – 10 are
18 principals or supervisory employees of the named defendants, suppliers of the named
19 defendants or other entities or individuals who are manufacturing, distributing,
20 selling and/or offering for sale merchandise in this judicial district which infringes
21 some or all of Plaintiffs' Properties. The identities of the various Does are unknown
22 to Plaintiffs at this time. The Complaint will be amended to include the names of
23 such individuals when identified. The named defendants and Does 1 – 10 are
24 collectively referred to herein as "Defendants."

25 **H. Defendants' Infringing Activities**

26 50. Upon information and belief, long after Plaintiffs' adoption and use of
27 Plaintiffs' Properties on a diverse range of goods, and after Plaintiffs obtained the
28 copyright and trademark registrations alleged above, Defendants adopted and used

1 substantially identical likenesses of Plaintiffs' Properties on Infringing Product,
2 without Plaintiffs' consent, by manufacturing, importing, advertising, displaying,
3 distributing, selling and/or offering to sell the Infringing Product. Defendants have
4 caused the Infringing Product to enter into commerce and to be transported or used
5 in commerce. Defendants are not licensed by Plaintiffs and at all relevant times were
6 not authorized by Plaintiffs, or each of them, or any authorized agent of Plaintiffs to
7 manufacture, import, distribute, sell and/or offer for sale the Infringing Product.
8 Defendants are currently engaged in such uses and, unless enjoined by this Court,
9 will continue such unauthorized uses.

10 51. By engaging in this conduct, Defendants have acted in willful disregard
11 of laws protecting Plaintiffs' goodwill and related proprietary rights and have
12 confused and deceived, or threaten to confuse and deceive, the consuming public
13 concerning the source and sponsorship of the products. By their wrongful conduct,
14 Defendants have traded upon and diminished the Plaintiffs' goodwill.

15 **FIRST CLAIM FOR RELIEF**

16 **(For Copyright Infringement)**

17 52. Plaintiffs repeat and reallege all of the allegations contained in
18 paragraphs 1 through 51, inclusive, as though set forth herein in full.

19 53. Plaintiffs are informed and believe, and upon that basis allege, that the
20 Defendants have each obtained gains, profits and advantages as a result of their
21 infringing acts in amounts within the jurisdiction of the Court.

22 54. Plaintiffs are informed and believe, and upon that basis allege, that they
23 have suffered and continue to suffer direct and actual damages as result of
24 Defendants' infringing conduct as alleged herein, in amounts within the jurisdiction
25 of this Court. In order to determine the full extent of such damages, including such
26 profits as may be recoverable under 17 U.S.C. § 504, Plaintiffs will require an
27 accounting from each Defendant of all monies generated from the manufacture,
28 importation, distribution and/or sale of the Infringing Product as alleged herein. In

1 the alternative, Plaintiffs may elect to recover for each of their respective
2 copyrighted works infringed, statutory damages pursuant to 17 U.S.C. § 504(c).

3 55. Plaintiffs have no other adequate remedy at law and have suffered and
4 continue to suffer irreparable harm and damage as a result of the above-described
5 acts. Plaintiffs are informed and believe, and upon that basis allege, that, unless
6 enjoined by the Court, the unlawful infringement by Defendants of Plaintiffs'
7 Properties will continue with irreparable harm and damage to Plaintiffs, and each of
8 them. Accordingly, Plaintiffs seek and request permanent injunctive relief pursuant
9 to 17 U.S.C § 502.

10 56. By reason of the foregoing, Plaintiffs have incurred and will continue to
11 incur attorneys' fees and other costs in connection with the prosecution of their
12 claims herein, which attorneys' fees and costs Plaintiffs are entitled to recover from
13 the Defendants, and each of them, pursuant to 17 U.S.C. § 505.

14 **SECOND CLAIM FOR RELIEF**

15 **(For Trademark Infringement)**

16 57. Plaintiffs repeat and reallege all of the allegations contained in
17 paragraphs 1 through 56, inclusive, as though set forth herein in full.

18 58. Defendants' manufacture, importation, advertisement, display,
19 promotion, marketing, distribution, sale and/or offer for sale of the Infringing
20 Product is likely to cause confusion or to cause mistake or to deceive the relevant
21 public and trade regarding the affiliation, sponsorship, endorsement or approval of
22 the Infringing Product by Plaintiffs, or each of them. Such confusion, mistake and
23 deception is aggravated by the confusing similarity between Plaintiffs' Properties
24 and the use of substantially identical likenesses on the Infringing Product in the same
25 type of goods made, imported and sold by or under authority of Plaintiffs, and each
26 of them.

27 59. Plaintiffs are informed and believe and, upon that basis allege, that
28 Defendants, and each of them, acted with knowledge of the federally registered

1 trademarks alleged herein and of the valuable goodwill Plaintiffs enjoy in connection
2 therewith, with intent to confuse, mislead and deceive the public into believing that
3 the Infringing Product was made, imported and sold by Plaintiffs, or each of them, or
4 are in some other manner, approved or endorsed by Plaintiffs, or each of them.

5 60. Plaintiffs have suffered and continue to suffer irreparable harm and
6 damage as a result of Defendants' acts of trademark infringement in amounts thus far
7 not determined but within the jurisdiction of this Court, which amounts should each
8 be trebled pursuant to 15 U.S.C. § 1117. In order to determine the full extent of such
9 damages, including such profits as may be recoverable under 15 U.S.C. § 1117,
10 Plaintiffs will require an accounting from each Defendant of all monies generated
11 from the manufacture, importation, distribution and/or sale of the Infringing Product
12 as alleged herein. In the alternative, Plaintiffs may elect to recover statutory
13 damages pursuant to 15 U.S.C. § 1117(c).

14 61. Plaintiffs have no other adequate remedy at law and have suffered and
15 continue to suffer irreparable harm and damage as a result of the above-described
16 acts of infringement. Plaintiffs are informed and believe, and upon that basis allege,
17 that, unless enjoined by the Court, the unlawful infringement will continue with
18 irreparable harm and damage to Plaintiffs, and each of them. Accordingly, Plaintiffs
19 seek and request preliminary and permanent injunctive relief pursuant to 15 U.S.C. §
20 1116.

21 62. By reason of the foregoing, Plaintiffs have incurred and will continue to
22 incur attorneys' fees and other costs in connection with the prosecution of their
23 claims herein, which attorneys' fees and costs Plaintiffs are entitled to recover from
24 Defendants, and each of them, pursuant to 15 U.S.C. § 1117(c).

25 **THIRD CLAIM FOR RELIEF**

26 **(For Unfair Competition)**

27 63. Plaintiffs repeat and reallege all of the allegations contained in
28 paragraphs 1 through 62, inclusive, as though set forth herein in full.

1 64. Plaintiffs own all rights, title and interest in and to the trademarks, trade
2 names, service marks, artwork, characters and other distinctive elements for and
3 incorporating Plaintiffs' Properties.

4 65. Plaintiffs' Properties have each acquired a secondary and distinctive
5 meaning among the public, which has come to identify Plaintiffs, and each of them,
6 through various media, including films, books, television, theme parks, magazines
7 and other sources, and through the distribution and sale of authorized merchandise,
8 and the distinctive features of each of, as designating products associated with
9 Plaintiffs. As a result of the extensive advertising, media exposure, sales and public
10 recognition of Plaintiffs' Properties, combined with the positive experiences of the
11 public in its relationship with Plaintiffs, and each of them, Plaintiffs' Properties are
12 each symbolic of Plaintiffs, and each of them, and representative of the image which
13 the public has of Plaintiffs, and each of them.

14 66. Plaintiffs are informed and believe, and upon that basis allege, that
15 Defendants, and each of them, have, without permission, authority or license from
16 Plaintiffs, and each of them, or its licensees, affixed, applied and/or used in
17 connection with the manufacture, importation, advertisement, display, promotion,
18 marketing, distribution, sale and/or offer for sale, false descriptions and
19 representations including words or other symbols which tend falsely to describe or
20 represent such goods as Plaintiffs and/or affiliated with Plaintiffs, and each of them,
21 and have caused the entry of such goods into interstate commerce with full
22 knowledge of the falsity of such designations of origin and such descriptions and
23 representations, all to the detriment of Plaintiffs. Defendants, and each of them, by
24 misappropriating and using one or more of Plaintiffs' Properties, have
25 misrepresented and falsely described to the general public the origin, source,
26 association, affiliation or sponsorship of their goods so as to create the likelihood of
27 confusion by the ultimate purchaser as to both the source and sponsorship of said
28 goods.

1 67. Plaintiffs are informed and believe, and upon that basis allege, that the
2 Infringing Product being manufactured, imported, advertised, marketed, displayed,
3 distributed, sold and/or offered for sale by Defendants, and each of them, are of
4 inferior quality and that the sale and/or offer for sale thereof will be damaging to and
5 dilute the goodwill and reputation of Plaintiffs, and each of them.

6 68. Defendants' acts and conduct, as alleged herein, including, without
7 limitation, the Defendants' duplication and imitation of Plaintiffs' Properties, are
8 business practices likely to deceive or confuse the purchasing public and trade upon
9 Plaintiffs' reputations, both as to the source, origin, sponsorship and approval of the
10 goods provided and as to the affiliation, connection or association of Defendants, and
11 each of them, with Plaintiffs and constitute acts of unfair competition, false
12 designation of origin and false representation of affiliation, all in violation of 15
13 U.S.C. § 1125(a). Plaintiffs are informed and believe, and upon that basis allege,
14 that each of Defendants' respective acts of reputation appropriation and unfair
15 competition was willful.

16 69. Plaintiffs have no adequate remedy at law and have each suffered and
17 continue to suffer irreparable harm and damage as a result of Defendants' respective
18 acts of unfair competition in amounts thus far not determined but within the
19 jurisdiction of this Court, which amounts should each be trebled pursuant to 15
20 U.S.C. § 1117.

21 70. Plaintiffs are informed and believe, and upon that basis allege, that
22 unless enjoined by the Court the confusion and deception alleged above and the
23 likelihood thereof will continue with irreparable harm and damage to Plaintiffs, and
24 each of them. Accordingly, Plaintiffs seek and request preliminary and permanent
25 injunctive relief pursuant to 15 U.S.C. § 1116.

26 71. Plaintiffs are informed and believe, and upon that basis allege, that
27 Defendants have each obtained gains, profits and advantages as a result of their
28 wrongful acts of unfair competition in amounts not thus far determined but within

1 the jurisdiction of this Court, which amounts should each be trebled, pursuant to 15
2 U.S.C. § 1117.

3 72. In order to determine the full extent of such damages, including such
4 profits as may be recoverable, Plaintiffs require an accounting from each Defendant
5 of all monies generated from the manufacture, importation, distribution and/or sale
6 of the Infringing Product.

7 73. By reason of the foregoing, Plaintiffs have incurred and will continue to
8 incur attorneys' fees and other costs in connection with the prosecution of their
9 claims herein, which attorneys' fees and costs Plaintiffs are entitled to recover from
10 the Defendants, and each of them, pursuant to 15 U.S.C. § 1117.

11 **FOURTH CLAIM FOR RELIEF**

12 **(For Trademark Dilution)**

13 74. Plaintiffs repeat and reallege all of the allegations contained in
14 paragraphs 1 through 73, inclusive, as though set forth in full herein.

15 75. The extensive advertising, media exposure, sales and public recognition
16 of Plaintiffs' Properties, combined with the positive experiences of the public in its
17 relationship with Plaintiffs, and each of them, have made Plaintiffs' Properties each
18 famous and distinctive marks that are symbolic of Plaintiffs, and each of them, and
19 representative of the image the public has of Plaintiffs, and each of them.

20 76. Plaintiffs' Properties are extraordinarily famous and well known
21 throughout the United States and elsewhere, having been used extensively by
22 Plaintiffs, and each of them. By reason of Plaintiffs' extensive use of Plaintiffs'
23 Properties, each has become highly distinctive of Plaintiffs' goods and services and
24 is uniquely and exclusively associated with Plaintiffs, and each of them. Plaintiffs'
25 Properties are famous marks within the purview of Section 43(c) of the Lanham Act,
26 15 U.S.C. § 1125(c).

27 77. Defendants' acts and conduct, as alleged herein, including Defendants'
28 use of Plaintiffs' Trademarks on and in connection with the manufacture,

1 importation, advertisement, display, distribution, sale and/or offer for sale of the
2 Infringing Product are commercial business practices which trade on Plaintiffs'
3 reputations and cause dilution of one or more of each of the famous, distinctive and
4 pre-existing Trademarks, by lessening the capacity of these marks to exclusively
5 identify and to distinguish Plaintiffs, and each of them, and their goods and services,
6 and constitute dilution, all in violation of Section 43(c) of the Lanham Act, 15 U.S.C.
7 § 1125(c). Plaintiffs are informed and believe, and upon that basis allege, that each
8 of Defendants' acts of trademark dilution and reputational appropriation was willful
9 and that each Defendant willfully intended to reap the benefit of Plaintiffs' goodwill,
10 trade upon Plaintiffs' reputations and/or dilute the distinctiveness of one or more of
11 Plaintiffs' famous and distinctive trademarks.

12 78. Plaintiffs are informed and believe, and upon that basis allege, that
13 unless enjoined by the Court, Defendants' unlawful and unauthorized acts in
14 violation of Section 43(c) of the Lanham Act will continue to cause dilution of one or
15 more of Plaintiffs' Properties with the corresponding irreparable harm and damage to
16 Plaintiffs, and each of them. Accordingly, Plaintiffs seek preliminary and permanent
17 injunctive relief pursuant to 15 U.S.C. § 1116.

18 79. Plaintiffs have no adequate remedy at law and have suffered and
19 continue to suffer irreparable harm and damage as a result of Defendants' acts of
20 trademark dilution in amounts thus far not determined, but within the jurisdiction of
21 this Court, which amounts should be trebled pursuant to 15 U.S.C. § 1116.

22 80. Plaintiffs are informed and believe, and upon that basis allege, that
23 Defendants have each obtained gains, profits and advantages as a result of their
24 wrongful acts of trademark dilution in amounts thus far not determined but within
25 the jurisdiction of this Court, which amounts should be trebled pursuant to 15 U.S.C.
26 § 1117.

27 81. In order to determine the full extent of such damages, including such
28 profits as may be recoverable, Plaintiffs will require an accounting from each

1 Defendant of all monies generated from the manufacture, importation, distribution
2 and/or sale of the diluting items alleged herein.

3 82. By reason of the foregoing, Plaintiffs have incurred and will continue to
4 incur attorneys' fees and other costs in connection with the prosecution of their
5 claims herein, which attorneys' fees and costs Plaintiffs are entitled to recover from
6 Defendants, and each of them, pursuant to 15 U.S.C. § 1117.

7 **FIFTH CLAIM FOR RELIEF**

8 **(For State Law Unfair Competition)**

9 83. Plaintiffs repeat and reallege all the allegations contained in paragraphs
10 1 through 82, inclusive, as though set forth herein in full.

11 84. As alleged above, each of Plaintiffs' Properties has acquired secondary
12 meaning indicative of origin, relationship, sponsorship and/or association with
13 Plaintiffs, and each of them. The purchasing public is likely to attribute to Plaintiffs,
14 and each of them, the use by Defendants and/or their customers, of one or more of
15 Plaintiffs' Properties, as a source of origin, authorization and/or sponsorship for
16 Defendants and/or their customers' goods and therefore to purchase such goods
17 based upon that erroneous belief.

18 85. Plaintiffs are informed and believe, and upon that basis allege, that
19 Defendants, and each of them, have intentionally appropriated one or more of
20 Plaintiffs' Properties with the intent of causing confusion, mistake and deception as
21 to the source of their and/or their third party wholesale customers' goods and with
22 the intent to palm off such goods as those of Plaintiffs, and each of them, and, as
23 such, Defendants have each committed trademark infringement, misleading
24 advertising and unfair competition, all in violation of the California Unfair Business
25 Practices Act, Cal. Bus. & Prof. Code, § 17200, *et seq.*

26 86. Plaintiffs have no adequate remedy at law and have suffered and
27 continue to suffer irreparable harm and damage as a result of each of Defendants'
28 acts in an amount thus far not determined but within the jurisdiction of this Court.

1 87. Plaintiffs are informed and believe, and upon that basis allege, that
2 unless enjoined by the Court, the confusion and deception alleged herein and the
3 likelihood thereof will continue with irreparable harm and damage to Plaintiffs, and
4 each of them.

5 88. Plaintiffs are informed and believe, and upon that basis allege, that
6 Defendants have each unlawfully and wrongfully derived and will continue to derive
7 income, gains, profits and advantages as a result of their wrongful acts of unfair
8 competition, in amounts thus far not determined but within the jurisdiction of this
9 Court. Plaintiffs are informed and believe, and upon that basis allege, that they have
10 lost and will continue to lose profits and goodwill as a result of Defendants' conduct.

11 89. By reason of the foregoing acts of unfair competition, Plaintiffs are
12 entitled to restitution from each Defendant of all income, gains, profits and
13 advantages resulting from their wrongful conduct in amounts to be determined
14 according to proof at trial.

15 90. In order to determine the full extent of such damages, including such
16 profits as may be recoverable, Plaintiffs will require an accounting from each
17 Defendant of all monies generated from the manufacture, importation, distribution
18 and/or sale of the Infringing Product.

19 91. Plaintiffs are informed and believe, and upon that basis allege, that
20 Defendants, and each of them, committed the acts alleged herein intentionally,
21 fraudulently, maliciously, willfully, wantonly and oppressively, with intent to injure
22 Plaintiffs in their business and with conscious disregard for Plaintiffs' rights, thereby
23 justifying awards of punitive and exemplary damages against each Defendant in
24 amounts sufficient to punish each Defendant and to set an example for others.

25 **SIXTH CLAIM FOR RELIEF**

26 **(State Law Trademark Dilution)**

27 92. Plaintiffs repeat and reallege all of the allegations contained in
28 paragraphs 1 through 91, inclusive, as though set forth herein in full.

1 likenesses of or bear a confusing and/or substantial similarity to any of
2 Plaintiffs' Properties;

3 4. Engaging in any conduct that tends falsely to represent that, or is
4 likely to confuse, mislead or deceive purchasers, Defendants' customers
5 and/or members of the public to believe the actions of Defendants, the
6 products sold by Defendants, or Defendants themselves are connected with
7 Plaintiffs, are sponsored, approved or licensed by Plaintiffs or are in some way
8 affiliated with Plaintiffs;

9 5. Affixing, applying, annexing or using in connection with the
10 importation, manufacture, distribution, advertising, sale and/or offer for sale or
11 other use of any goods or services, a false description or representation,
12 including words or other symbols, tending to falsely describe or represent such
13 goods as being those of Plaintiffs;

14 6. Otherwise competing unfairly with Plaintiffs in any manner;

15 7. Destroying or otherwise disposing of

16 a. Merchandise falsely bearing Plaintiffs' Properties;

17 b. Any other products which picture, reproduce, copy or use
18 the likenesses of or bear a substantial similarity to any of Plaintiffs'
19 Properties;

20 c. Any labels, packages, wrappers, containers or any other
21 unauthorized promotion or advertising material item which
22 reproduces, copies, counterfeits, imitates or bears any of Plaintiffs'
23 Properties;

24 d. Any molds, screens, patterns, plates, negatives or other
25 elements used for making or manufacturing products bearing
26 Plaintiffs' Properties;

27 e. Any sales and supply or customer journals, ledgers,
28 invoices, purchase orders, inventory control documents, bank records,

1 catalogs and all other business records, believed to concern the
2 manufacture, purchase, advertising, sale or offering for sale of the
3 Infringing Product;

4 B. That Plaintiffs, and each of them, and their designees are authorized to
5 seize the following items which are in Defendants' possession, custody or control:

6 1. All unauthorized products bearing Plaintiffs' Properties, or
7 likenesses thereof;

8 2. Any other unauthorized products which reproduce, copy,
9 counterfeit, imitate or bear any of Plaintiffs' Properties or which picture,
10 reproduce, copy or use the likeness of or bear a substantial similarity to
11 Plaintiffs' Properties;

12 3. Any labels, packages, wrappers, containers and any other
13 unauthorized promotional or advertising material which reproduce, copy,
14 counterfeit, imitate or bear any of Plaintiffs' Properties or which picture,
15 reproduce, copy or use the likeness of or bear a substantial similarity to
16 Plaintiffs' Properties;

17 4. Any molds, screens, patterns, plates, negatives, machinery or
18 equipment used for making or manufacturing the Infringing Product or
19 unauthorized items which bear Plaintiffs' Properties or which bear a
20 substantial similarity to any of Plaintiffs' Properties.

21 C. That those Defendants infringing upon Plaintiffs' Properties be required
22 to pay actual damages increased to the maximum extent permitted by law and/or
23 statutory damages at Plaintiffs' election;

24 D. That actual damages be trebled pursuant to 15 U.S.C. § 1117;


25 E. That Defendants account for and pay over to Plaintiffs all damages
26 sustained by Plaintiffs, and each of them, and profits realized by Defendants by
27 reason of Defendants' unlawful acts herein alleged and that those profits be
28 increased as provided by law;

1 F. That Plaintiffs recover from Defendants their costs of this action and
2 reasonable attorneys' fees; and

3 G. That Plaintiffs have all other and further relief as the Court may deem
4 just and proper under the circumstances.

5
6 Dated: September 29, 2009

J. Andrew Coombs, A Professional Corp.

7
8 By:  J. Andrew Coombs

9 Nicole L. Drey

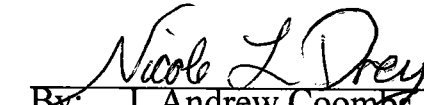
10 Attorneys for Plaintiffs Sanrio, Inc., Disney
11 Enterprises, Inc., Warner Bros. Entertainment
12 Inc. and DC Comics
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DEMAND FOR JURY TRIAL

Pursuant to Federal Rule of Civil Procedure 38(b), Plaintiffs Sanrio, Inc.,
Disney Enterprises, Inc., Warner Bros. Entertainment Inc. and DC Comics hereby
demand a trial by jury of all issues so triable.

DATED: September 29, 2009

J. Andrew Coombs, A Professional Corp.


By: J. Andrew Coombs
Nicole L. Drey

Attorneys for Plaintiffs Sanrio, Inc., Disney
Enterprises, Inc., Warner Bros. Entertainment
Inc. and DC Comics

EXHIBIT A**SANRIO CO.'S COPYRIGHTED DESIGNS**

Copyright Registration	Title of Work (Character)	Type of Work
VA 1 296 115	2004 – 100 Characters	Graphic Artwork
VA 811 440	Bad Badtz Maru	Graphic Artwork
VAu 498 617	Chococat	Art original
VA 130 420	Hello Kitty	Graphic Artwork
VA 636 579	KeroKeroKeroppi	Sticker Book
VA 246 421	Little Twin Stars	Stickers
VA 840 495	Monkichi	Graphic Artwork
VA 130 419	My Melody	Graphic Artwork
VA 130 421	Patty & Jimmy	Graphic Artwork
VA 636 582	Pekkle	Graphic Artwork
VA 840 496	Picke Bicke	Graphic Artwork
VA 636 580	Pochacco	Sticker Book
VA 148 625	Tuxedo Sam	Stickers
VA 840 494	Winkipinki	Graphic Artwork
VA 636-581	Zashikibuta	Stickers

EXHIBIT B**SANRIO'S TRADEMARKS**

Trademark	Mark Drawing Code	Trademark Registration No.	Trademark Registration Date
Chococat	Design Plus Words, Letters, and/or Numbers	2,842,707	5/18/04
Chococat	Design Plus Words, Letters, and/or Numbers	2,707,592	4/15/03
Chococat	Design Plus Words, Letters, and/or Numbers	2,705,164	4/8/03
Chococat	Design Plus Words, Letters, and/or Numbers	2,714,130	5/6/03
Chococat	Design Plus Words, Letters, and/or Numbers	2,952,043	5/17/05
Chococat	Design Plus Words, Letters, and/or Numbers	2,845,315	5/25/04
Hello Kitty	Design Only	1,200,083	7/6/82
Hello Kitty	Design Only	1,277,721	5/15/84
Hello Kitty	Typed Drawing	1,215,436	11/9/82
Hello Kitty	Typed Drawing	1,279,486	5/29/84
Hello Kitty	Typed Drawing	1,391,550	4/29/86
Hello Kitty	Design Only	1,370,105	11/12/85
Keroppi	Standard Character Mark	3,531,383	11/11/08
Keroppi	Standard Character Mark	3,181,350	12/5/06
Keroppi	Standard Character Mark	3,531,382	11/11/08
Keroppi	Standard Character Mark	3,181,349	12/5/06
Keroppi	Standard Character Mark	3,436,548	5/27/08
Keroppi	Standard Character Mark	3,181,348	12/5/06

Keroppi	Standard Character Mark	3,181,347	12/5/06
Keroppi	Standard Character Mark	3,449,938	6/17/08
Keroppi	Standard Character Mark	3,531,381	11/11/08
Keroppi	Standard Character Mark	3,531,380	11/11/08
Keroppi	Standard Character Mark	3,181,346	12/5/06
Keroppi	Standard Character Mark	3,423,288	5/6/08
Keroppi	Standard Character Mark	3,181,345	12/5/06
Little Twin Stars	Typed Drawing	1,341,864	6/18/85
Little Twin Stars	Typed Drawing	1,192,946	4/6/82
Little Twin Stars	Standard Character Mark	3,245,999	5/29/07
Little Twin Stars	Standard Character Mark	3,245,998	5/29/07
Little Twin Stars	Standard Character Mark	3,245,997	5/29/07
Little Twin Stars	Standard Character Mark	3,245,994	5/29/07
Little Twin Stars	Standard Character Mark	3,245,993	5/29/07
Little Twin Stars	Standard Character Mark	3,245,992	5/29/07
Little Twin Stars	Standard Character Mark	3,245,991	5/29/07
Monkichi	Standard Character Mark	Serial Number 77,154,633	n/a
Monkichi	Standard Character Mark	Serial Number 77,154,635	n/a
My Melody	Typed Drawing	1,305,637	11/20/84
My Melody	Typed Drawing	1,210,192	9/28/82
Pekkle	Typed Drawing	2,327,584	3/14/00
Pekkle	Typed Drawing	2,053,346	4/15/97

Pochacco	Typed Drawing	2,236,507	4/6/99
Pochacco	Typed Drawing	1,985,358	7/9/96
Sanrio	Design Plus Words, Letters, and/or Numbers	2,506,705	11/13/01
Sanrio	Typed Drawing	2,506,577	11/13/01
Sanrio	Design Plus Words, Letters, and/or Numbers	2,721,680	6/3/03
Sanrio	Design Plus Words, Letters, and/or Numbers	2,742,381	7/29/03
Sanrio	Design Plus Words, Letters, and/or Numbers	2,721,679	6/3/03
Sanrio	Design Plus Words, Letters, and/or Numbers	2,693,639	3/4/03
Sanrio	Design Plus Words, Letters, and/or Numbers	2,696,063	3/11/03

EXHIBIT C
DISNEY'S COPYRIGHTED DESIGNS

Copyright Registration	Title of Work (Character)	Type of Work
VA 58 937	Mickey - 1 (Mickey Mouse)	Model Sheet
VA 58 938	Minnie - 1 (Minnie Mouse)	Model Sheet
Gp 80 184	Donald Duck	Publications Model Sheet
VA 58 933	Daisy - 1 (Daisy Duck)	Model Sheet
VA 58 936	Goofy -1 (Goofy)	Model Sheet
Gp 80 192	Pluto	Publications Model Sheet
VAu 64 814	Baby Mickey	Model Sheet
VAu 64 814	Baby Minnie	Model Sheet
VAu 73 216	Baby Donald Duck	Model Sheet
VAu 73 217	Baby Daisy Duck	Model Sheet
VAu 83 225	Baby Goofy	Model Sheet
VAu 73 219	Baby Pluto	Model Sheet
R 48 971	Disney's Uncle Scrooge in Only a Poor Old Man	Comic Strip
RE 424 728	Walt Disney's Ludwig von Drake	Comic Strip
Gp 105 126	Horace Horsecollar	Model Sheet
R 567 615	Chip	Model Sheet
R 567 614	Dale	Model Sheet
VA 184 345	Huey, Dewey & Louie -1	Model Sheet
Gp 105 128	Clarabelle Cow	Model Sheet
RE 636 587	Winnie the Pooh and the Honey Tree	Motion Picture
RE 718 378	Winnie the Pooh and the Blustery Day	Motion Picture
VA 58 940	Pooh - 1 (Winnie the Pooh)	Model Sheet
Gp 81 528	Rabbit	Publications Model Sheet
Gp 81 528	Owl	Publications Model Sheet
Gp 85 651	Kanga and Roo	Publications Model Sheet
Gp 81 528	Eeyore	Publications Model Sheet
Gp 81 528	Piglet	Publications Model Sheet
Gp 81 528	Gopher	Publications Model Sheet
Gp 81 527	Tigger	Publications Model Sheet
R 354 235	Snow White and the Seven Dwarfs	Motion Picture
R 346 870	Bashful	Drawings
R 346 869	Doc	Drawings
R 346 875	Dopey	Drawings

1	R 346 876	Grumpy	Drawings
2	R 346 871	Happy	Drawings
3	R 346 874	Sleepy	Drawings
4	R 346 873	Sneezy	Drawings
5	R 346 872	Snow White	Drawings
6	R 346 868	Snow White "Witch"	Drawings
7	R 406 910	Pinocchio	Motion Picture
8	Gp 80 186	Pinocchio	Publications Model Sheet
9	Gp 80 188	Jiminy Cricket	Publications Model Sheet
10	R 427 860	Fantasia	Motion Picture
11	R 433 627	The Reluctant Dragon	Motion Picture
12	R 442 538	Dumbo	Motion Picture
13	R 428 428	Dumbo Suggestions for Dumbo	Drawing
14	R 428 420	Mother Elephant Suggestions for "Dumbo"	Drawing
15	R 428 430	Dumbo Ringmaster Suggestions 1348	Drawing
16	R 428 427	Dumbo - Stork Suggestions	Drawing
17	R 428 426	Timothy Mouse Suggestions	Drawing
18	R 428 432	Dumbo "Miscellaneous Crows" - 2006	Drawing
19	R 458 260	Bambi	Motion Picture
20	R 433 645	Bambi - Bambi	Drawing
21	R 433 630	Bambi - Final Thumper Model - 2002	Drawing
22	R 433 631	Bambi - Skunk Model - 2002	Drawing
23	R 433 636	Bambi - Owl and Stag Models	Drawing
24	R 433 632	Faline "Adolescent Age"	Drawing
25	R 433 633	Bambi's Mother	Drawing
26	R 467 541	Saludos Amigos	Motion Picture
27	R 464 785	Joe Carioca	Drawing
28	R 516 560	The Three Caballeros	Motion Picture
	R 550 316	Make Mine Music	Motion Picture
	R 557 922	Song of the South	Motion Picture
	R 548 629	Brer Rabbit	Drawing
	R 548 626	Brer Bear	Drawing
	R 577 489	Fun and Fancy Free	Motion Picture
	R 605 180	Melody Time	Motion Picture
	R 636 303	The Adventures of Ichabod & Mr. Toad	Motion Picture
	R 648 396	Cinderella	Motion Picture
	R 632 319	Cinderella	Copyright Booklet
	R 632 319	Drizella	Copyright Booklet
	R 632 319	Anastasia	Copyright Booklet
	R 632 319	Stepmother	Copyright Booklet
	R 632 319	Fairy Godmother	Copyright Booklet
	R 632 319	Prince	Copyright Booklet
	R 632 319	Bruno, the Dog	Copyright Booklet
	R 632 319	Lucifer, the Cat	Copyright Booklet
	R 632 319	Jaq and Gus	Copyright Booklet
	RE 27 746	Alice in Wonderland	Motion Picture

1	VA 58 920	Alice - 1 (Alice)	Model Sheet
2	VA 58 919	Alice - 2 (The White Rabbit)	Model Sheet
3	VA 58 921	Alice - 3 (Queen of Hearts)	Model Sheet
4	VA 58 922	Alice - 4 (Cheshire Cat)	Model Sheet
5	VA 58 923	Alice - 5 (Caterpillar)	Model Sheet
6	VA 58 924	Alice - 6 (Tweedledee and Tweedledum)	Model Sheet
7	VA 58 922	March Hare	Model Sheet
8	VA 58 922	Mad Hatter	Model Sheet
9	RE 64 027	Peter Pan	Motion Picture
10	RE 66 285	Peter Pan	Coloring Book
11	RE 66 285	Tinkerbell	Coloring Book
12	RE 66 285	Captain Hook	Coloring Book
13	RE 66 285	Mr. Smee	Coloring Book
14	RE 66 285	Nana	Coloring Book
15	RE 162 852	Lady and the Tramp	Motion Picture
16	RE 101 764	Lady	Previews of Pictures
17	RE 101 764	Tramp	Previews of Pictures
18	RE 296 296	Sleeping Beauty	Motion Picture
19	RE 246 671	Princess Aurora	Book
20	RE 246 671	Prince Phillip	Book
21	RE 246 671	Maleficent/Dragon	Book
22	RE 370 901	One Hundred and One Dalmatians	Motion Picture
23	RE 546 478	The Sword in the Stone	Motion Picture
24	RE 557 357	Archimedes	Copyright Booklet
25	RE 557 357	Merlin	Copyright Booklet
26	RE 557 357	Wart/Arthur	Copyright Booklet
27	RE 557 357	Madame Mim	Copyright Booklet
28	RE 571 201	Mary Poppins	Motion Picture
29	RE 705 510	The Jungle Book	Motion Picture
30	RE 679 798	Mowgli	Drawing
31	RE 679 799	Baloo	Drawing
32	RE 679 795	Bagheera	Drawing
33	RE 679 805	King Louie	Drawing
34	RE 679 797	Kaa	Drawing
35	RE 679 807	Shere Khan	Drawing
36	Lp 38 283	The Aristocats	Motion Picture
37	Gu 44 754	O'Malley	Drawing
38	Gu 44 750	Duchess	Drawing
39	Gu 44 748	Edgar	Drawing
40	Gu 44 745	Roquefort	Drawing
41	VA 1-099-033	Marie Valentine Spring 2002	Style Guide
42	Lp 39 817	Bedknobs and Broomsticks	Motion Picture
43	Gu 46 904	Crocky	Drawing
44	Gu 46 908	Sailor Bear	Drawing
45	Gu 46 906	Codfish	Drawing
46	Gu 46 917	Secretary Bird	Drawing
47	LP 42 905	Robin Hood	Motion Picture

1	Gu 46 582	Robin Hood	Drawing
2	Gu 46 583	Little John	Drawing
3	Gu 46 584	Sir Hiss	Drawing
4	Gu 47 230	Sheriff of Nottingham	Drawing
5	Gu 47 762	Friar Tuck	Drawing
6	Gu 46 585	Prince John	Drawing
7	Gu 50 764	Maid Marion	Drawing
8	Gu 50 763	Lady Cluck	Drawing
9	Lp 49 678	The Rescuers	Motion Picture
10	Gp 96 289	Miss Bianca	Drawing
11	Gp 96 286	Orville	Drawing
12	Gp 96 288	Madame Medusa	Drawing
13	Gp 96 287	Bernard	Drawing
14	Gp 103 814	Penny	Drawing
15	Gu 57 278	Rufus	Drawing
16	Gu 56 625	Evinrude	Drawing
17	PA 1 371	Pete's Dragon	Motion Picture
18	Gp 111 695	Elliott the Dragon	Drawing
19	PA 125 861	The Fox and the Hound	Motion Picture
20	VAu 10 933	Todd (Young)	Drawing
21	VAu 10 930	Copper (Pup)	Drawing
22	VAu 10 936	Vixey	Drawing
23	VAu 10 928	Big Mama	Drawing
24	VAu 12 417	Dinky	Drawing
25	VAu 12 418	Boomer	Drawing
26	VAu 12 415	Squeeks	Drawing
27	PA 252 525	The Black Cauldron	Motion Picture
28	VAu 24 517	Eilonwy	Drawing
29	VAu 29 561	Fflewddur	Drawing
30	VAu 24 518	Gurgi	Drawing
31	VAu 24 070	Hen Wen	Drawing
32	VAu 24 592	The Horned King	Drawing
33	VAu 24 519	Taran	Drawing
34	VAu 47 075	Orddu	Drawing
35	VAu 47 073	Orgoch	Drawing
36	VAu 47 074	Orwen	Drawing
37	PA 290 808	The Great Mouse Detective	Motion Picture
38	VAu 76 103	Basil 185-126	Model Sheet
39	VAu 76 102	Dr. Dawson 1284-80	Model Sheet
40	VAu 81 570	Olivia	Model Sheet
41	VAu 76 100	Ratigan 285-166	Model Sheet
42	VAu 81 572	Fidget	Model Sheet
43	VAu 81 571	Flaversham	Model Sheet
44	VAu 86 112	Felicia - Clean Up Model 0238	Model Sheet
45	VAu 76 104	Toby 285-170	Model Sheet
46	VAu 85 019	Mrs. Judson	Model Sheet
47	VAu 85 021	Queen Victoria	Model Sheet
48	VAu 85 022	Bartholomew	Model Sheet
49	PA 385 556	Oliver and Company	Motion Picture

1	VAu 104 921	Dodger Construction Sheets	Model Sheet
2	VAu 104 920	Einstein Construction Sheets	Model Sheet
3	VAu 104 919	Frances Construction Sheets	Model Sheet
4	VAu 104 916	Rita Construction Sheets	Model Sheet
5	VAu 109 377	Oliver Rough Model	Model Sheet
6	VAu 109 379	Tito - Ruff Model	Model Sheet
7	VAu 119 949	How to Draw Georgette	Model Sheet
8	PA 431 543	The Little Mermaid	Motion Picture
9	VAu 123 355	Ariel 9-9-87 Ruff (Ariel)	Drawings
10	VAu 123 351	Scuttle	Drawings
11	VAu 123 354	Ruff Sebastion 9-4-87 (Sebastian)	Drawings
12	VAu 123 348	Ruff Ursula 9-9-87 (Ursula)	Drawings
13	VAu 123 352	Prince Eric	Drawings
14	VAu 123 350	Triton	Drawings
15	VAu 123 353	Flotsam/Jetsam	Drawings
16	VAu 123 349	Flounder	Drawings
17	PAu 1 024 341	DuckTales	Motion Picture
18	VAu 101 067	Launchpad McQuack	Pamphlet of Drawings
19	VAu 101 067	Webby	Pamphlet of Drawings
20	VAu 101 067	Doofus	Pamphlet of Drawings
21	VAu 101 067	Mrs. Beakley	Pamphlet of Drawings
22	VAu 101 067	Duckworth	Pamphlet of Drawings
23	PA 486 535	The Rescuers Down Under	Motion Picture
24	VAu 161 749	Cody	Model Sheets
25	VAu 155 884	Jake (Rough Models)	Model Sheets
26	VAu 155 844	McLeach (Rough Model)	Model Sheets
27	VAu 170 264	Marahute (Rough Model)	Model Sheets
28	PA 542 647	Beauty and the Beast	Motion Picture
29	VAu 200 866	Belle (Beauty and the Beast)	Artwork
30	VAu 210 914	Beast	Licensing Kit
31	VAu 194 311	Maurice (Beauty and the Beast)	Artwork
32	VAu 199 855	Mrs. Potts (Beauty and the Beast)	Artwork
33	VAu 200 868	Cogsworth (Beauty and the Beast)	Artwork
34	VAu 194 310	Lumiere (Beauty and the Beast)	Artwork
35	VAu 201 337	Chip (Beauty and the Beast)	Artwork
36	VAu 194 307	Gaston (Beauty and the Beast)	Artwork
37	VAu 194 309	LeFou (Beauty and the Beast)	Artwork
38	VAu 199 856	Phillipe (Beauty and the Beast)	Artwork
39	VAu 200 869	Featherduster (Beauty and the Beast)	Artwork
40	PA 583 905	Aladdin	Motion Picture
41	VAu 215 432	Aladdin - Aladdin	Model Sheet
42	VAu 215 453	Aladdin - Genie	Model Sheet
43	VAu 215 793	Aladdin - Abu	Model Sheet
44	VAu 218 349	Aladdin - Iago	Model Sheet
45	VAu 230 534	Aladdin - Rasoul	Model Sheet

1	VAu 218 348	Aladdin - The Sultan	Model Sheet
2	VAu 230 533	Aladdin - Jafar	Model Sheet
3	VAu 221 841	Aladdin - Jasmine	Model Sheet
4	VAu 221 842	Aladdin - Jafar as Beggar	Model Sheet
5	VAu 232 164	Aladdin - Narrator	Model Sheet
6	PA 659 979	The Lion King	Motion Picture
7	VAu 246 448	The Lion King - Mufasa	Model Sheet
8	VAu 245 946	The Lion King - Sarabi	Model Sheet
9	VAu 246 447	The Lion King - Simba	Model Sheet
10	VAu 246 440	The Lion King - Young Simba	Model Sheet
11	VAu 246 438	The Lion King - Nala	Model Sheet
12	VAu 246 664	The Lion King - Young Nala	Model Sheet
13	VAu 245 947	The Lion King - Rafiki	Model Sheet
14	VAu 245 945	The Lion King - Shenzi, Banzai & Ed	Model Sheet
15	VAu 246 437	The Lion King - Pumbaa	Model Sheet
16	VAu 245 662	The Lion King - Timon	Model Sheet
17	VAu 246 446	The Lion King - Scar	Model Sheet
18	VA 611 201	Zazu	Licensing Kit
19	PA 720 179	Pocahontas	Motion Picture
20	VAu 262 859	Pocahontas - Pocahontas Standing	Artwork
21	VAu 261 970	Pocahontas - Powhatan	Artwork
22	VAu 261 967	Pocahontas - Percy	Artwork
23	VAu 302 884	Pocahontas - John Smith	Artwork
24	VAu 302 886	Pocahontas - Meeko the Raccoon	Artwork
25	VAu 302 883	Pocahontas - Flit the Hummingbird	Artwork
26	VAu 300 559	Pocahontas - Ratcliffe	Artwork
27	VAu 302 885	Pocahontas - Grandmother Willow	Artwork
28	PA 765 713	Toy Story	Motion Picture
	VAu 337 565	Toy Story - Woody	Artwork
	VAu 337 566	Toy Story - Buzz Lightyear	Artwork
	VAu 337 567	Toy Story - Hamm	Artwork
	VAu 337 568	Toy Story - Rex	Artwork
	VAu 337 569	Toy Story - Bo Peep Lamp and Sheep	Artwork
	VAu 337 186	Toy Story - Lenny	Artwork
	VAu 273 627	Toy Story - Mom	Artwork
	VAu 348 598	Toy Story - Andy	Artwork
	VAu 348 599	Toy Story - Hannah	Artwork
	PA 795 221	The Hunchback of Notre Dame	Motion Picture
	VAu 336 992	The Hunchback of Notre Dame - Quasimodo	Model Sheet
	VAu 332 434	The Hunchback of Notre Dame - Esmeralda	Model Sheet
	VAu 336 056	The Hunchback of Notre Dame - Phoebus	Model Sheet
	VAu 336 057	The Hunchback of Notre Dame - Djali	Model Sheet
	VAu 343 663	The Hunchback of Notre Dame - Gargoyles	Model Sheets
	VAu 336 058	The Hunchback of Notre Dame - Clopin	Model Sheet
	VAu 336 059	The Hunchback of Notre Dame -	Model Sheet

1		Frollo	
2	VAu 336 878	The Hunchback of Notre Dame - Will Doll/Sam Doll	Model Sheet
3	PA 670 961	Hercules	Motion Picture
4	VAu 369 603	Hercules - Hercules	Model Sheets
4	VAu 369 600	Hercules - Baby Hercules	Model Sheets
5	VAu 367 973	Hercules - Meg	Model Sheets
5	VAu 369 605	Hercules - Pegasus	Model Sheets
6	VAu 369 598	Hercules - Baby Pegasus	Model Sheets
6	VAu 367 965	Hercules - Phil	Model Sheets
7	VAu 367 964	Hercules - Hades	Model Sheets
7	VAu 367 969	Hercules - Pain	Model Sheets
8	VAu 375 850	Hercules - Panic	Model Sheets
8	VAu 377 944	Hercules - Hydra Head	Model Sheet
9	PA 799 025	Mulan	Motion Picture
9	VA 849 510	Mulan	Style Guide
10	VAu 379 045	The Legend of Mulan - Mulan	Model Sheets
10	VAu 379 027	The Legend of Mulan - Mulan as Ping	Model Sheets
11	VAu 379 021	The Legend of Mulan - Mushu	Model Sheets
12	VAu 379 024	The Legend of Mulan - Shang	Model Sheets
12	VAu 378 480	The Legend of Mulan - Kahn	Model Sheets
13	VAu 381 069	The Legend of Mulan - Cricket	Model Sheets
13	PA 901 890	A Bug's Life*	Motion Picture
14	VA 875 986	A Bug's Life*	Style Guide
14	VAu 399 357	Flik*	Model Sheets
15	VAu 399 356	Hopper*	Model Sheets
15	VAu 399 351	Atta*	Model Sheets
16	VAu 399 349	Dot*	Model Sheets
16	VAu 399 343	Dim*	Model Sheets
17	VAu 399 352	Tuck & Roll*	Model Sheets
17	VAu 399 350	Francis*	Model Sheets
18	VAu 399 348	Heimlich*	Model Sheets
19	VAu 399 353	Slim*	Model Sheets
19	VAu 399 342	Rosie*	Model Sheets
20	VAu 399 346	P.T. Flea*	Model Sheets
20	VAu 399 345	Manny*	Model Sheets
21	VAu 399 344	Gypsy*	Model Sheets
21	VAu 399 347	Thumper*	Model Sheets
22	VAu 399 354	Molt*	Model Sheets
22	VAu 399 355	Queen*	Model Sheets
23	PA 959 870	Toy Story 2*	Motion Picture
24	VAu 414 563	Toy Story 2 - Al's Car*	Model Sheet
24	VAu 405 573	Toy Story 2 - Bullseye*	Model Sheet
25	VAu 406 700	Toy Story 2 - Coffee Table*	Model Sheet
25	VAu 407 195	Toy Story 2 - Cushy Chair*	Model Sheet
26	VAu 405 571	Toy Story 2 - Emporer Zurg*	Model Sheet
26	VAu 405 572	Toy Story 2 - Jessie*	Model Sheet
27	VAu 405 197	Toy Story 2 - L'il Yuppie*	Model Sheet
27	VAu 405 574	Toy Story 2 - Prospector*	Model Sheet
28	VAu 407 196	Toy Story 2 - Wood Chair*	Model Sheet

1	VA960 902	Toy Story 2 - Style Guide*	Style Guide
2	PA 974 011	Dinosaur	Motion Picture
3	VAu 486 473	Aladar	Model Sheet
4	VAu 486 477	Baylene	Model Sheet
5	VAu 486 476	Bruton	Model Sheet
6	VAu 486 478	Eema	Model Sheet
7	VAu 486 475	Kron	Model Sheet
8	VAu 486 474	Neera	Model Sheet
9	VAu 486 472	Plio	Model Sheet
10	VAu 486 479	Suri	Model Sheet
11	VAu 486 471	Yar	Model Sheet
12	VA 996 530	Dinosaur - Phase I	Style Guide
13	VA 992 942	Dinosaur - Phase II	Style Guide
14	PA 940 885	The Emperor's New Groove	Motion Picture
15	VA 999 573	Emporer's New Groove	Style Guide
16	VAu 479 682	Kronk	Model Sheet
17	VAu 479 685	Kuzco	Model Sheet
18	VAu 479 683	Kuzco Llama	Model Sheet
19	VAu 479 684	Pacha	Model Sheet
20	VAu 479 681	Yzma	Model Sheet
21	PA 1-250-536	The Incredibles	Motion Picture
22	VA 1-242-351	The Incredibles	Style Guide
23	PA 1-322-908	Cars	Motion Picture
24	VA 1-326-323	Cars – Style Guide	Style Guide
25	VA 1-403-647	Hannah Montana – Branding Guide	Style Guide
26	PA 659-601	Tim Burton's The Nightmare Before Christmas	Motion Picture
27	PA 1-313-530	High School Musical	Motion Picture
28	VA 1-405-082	High School Musical – Branding Guide	Style Guide
	PA 1-627-575	Hannah Montana the Movie	Motion Picture
	PA 1-635-067	Up	Motion Picture
	PA 1-641-991	G-Force	Motion Picture
	PA 1-606-305	Wall-E	Motion Picture
	VA 1-663-815	Wall-E – Branding and Supplement Style Guide RSM 2008	Style Guide
	PA 1-598-561	High School Musical 2	Motion Picture
	VA 1-651-813	High School Musical 2 – Summer 2008 Style Guide Supplement	Style Guide
	PA 1-613-593	High School Musical 3: Senior Year	Motion Picture
	VA 1-655-713	Beverly Hills Chihuahua	One Sheet
	PA 1-611-956	Beverly Hills Chihuahua	Motion Picture
	Pau 2-921-728	Little Mermaid III: Ariel's Beginning	Screenplay
	VA 515-038	Little Mermaid III: Ariel's Beginning	Comic Book
	PA 1-623-231	Bedtime Stories	Motion Picture
	PA 1-588-972	Underdog	Motion Picture
	PA 1-595-126	Enchanted	Motion Picture
	PA 1-332-118	Meet the Robinsons	Motion Picture
	VA 1-358-218	Meet the Robinsons—Style Guide	Style Guide
	PA 1-122-518	Cinderella II : Dreams come true /	Motion Picture

	produced by Walt Disney Television Animation ; directed by John Kafka	
PA 1-612-331	Cinderella III: A Twist in Time	Motion Picture
PA 1-611-943	Tinker Bell	Motion Picture
PA 1-617-950	Bolt	Motion Picture
VA 1-663-828	Bolt – Fall/Winter Style Guide 2008	Style Guide

EXHIBIT D
DISNEY'S TRADEMARKS

Trademark	Mark Drawing Code	Trademark Registration No.	Trademark Registration Date
Mickey Mouse	Typed Drawing	78,976,959	n/a
Mickey Mouse	Standard Character Mark	Serial Number 77,130,011	n/a
Mickey Mouse	Typed Drawing	3,006,349	10/11/05
Mickey Mouse	Typed Drawing	315,056	7/17/34
Mickey Mouse	Standard Character Mark	77,130,201	n/a
Mickey Mouse	Typed Drawing	1,115,389	4/28/81
Mickey Mouse	Typed Drawing	1,152,389	4/28/81
Mickey Mouse	Design Only	2,704,887	4/8/03
Mickey Mouse Head Device	Design Only	2,781,693 (Serial Number 78637100)	11/11/03
Minnie Mouse	Typed Drawing	3,102,338	6/06/06
Minnie Mouse	Design Only	2,700,619	3/25/03
Minnie Mouse	Standard Character Mark	Serial Number 77130173	n/a
Minnie Mouse	Standard Character Mark	Serial Number 77099715	n/a
Minnie Mouse	Typed Drawing	Serial Number 78159805	n/a
Pluto	Typed Drawing	1,152,383	4/28/81
Pluto	Design Only	2,707,323	4/15/03
Goofy	Typed Drawing	1,159,124	6/30/81
Goofy	Design Only	2,721,608	6/3/03

Donald Duck	Typed Drawing	1,161,868	7/21/81
Donald Duck	Design Only	2,700,620	3/25/03
Donald Duck	Typed Drawing	3,120,077	9/26/06
Daisy Duck	Design Only	2,704,890	4/8/03
Disney	Typed Drawing	1,162,727	7/28/81
Disney	Typed Drawing	1,838,246 (Serial Number 78163606)	5/31/94
Disney Princess	Standard Character Mark	1,037,788 (Serial Number 78743842)	4/13/76
Walt Disney	Typed Drawing	1,141,312	11/11/80
Walt Disney Signature	Standard Character Mark	1,162,727 (Serial Number 78864123)	7/28/81
Winnie the Pooh	Typed Drawing	3,024,287	12/6/05
Pooh	Design Only	2,704,888	4/8/03
Pooh	Typed Drawing	2,623,099 (Serial Number 78159758)	9/24/02
Piglet	Design Only	2,700,618	3/25/03
Tigger	Design Only	2,860,445	7/6/04
Eeyore	Design Only	Serial Number 76587948	n/a
Eeyore	Typed Drawing	Serial Number 78159727	n/a
Walt Disney's Cinderella	Design Plus Words, Letters, and/or Numbers	3,057,988	2/7/06
Walt Disney's Snow White & the Seven Dwarfs	Design Plus Words, Letters, and/or Numbers	2,891,463	10/5/04
Walt Disney's Sleeping Beauty	Design Plus Words, Letters, and/or Numbers	2,895,966	10/19/04
Sleeping Beauty	Standard Character Mark	Serial Number 77,173,609	n/a

Peter Pan	Standard Character Mark	Serial Number 78911868	n/a
Walt Disney's Peter Pan	Design Plus Words, Letters, and/or Numbers	2895967	10/19/04
Tinker Bell	Standard Character Mark	Serial Number 78911784	n/a
Tinker Bell	Standard Character Mark	Serial Number 78911879	n/a
Tinker Bell	Design Only	Serial Number 78956939	n/a
Tink	Typed Drawing	Serial Number 76099680	n/a
Hannah Montana	Standard Character Mark	3,478,026	7/29/08
Hannah Montana	Standard Character Mark	3,413,555	4/15/08
Hannah Montana	Standard Character Mark	3,473,757	7/22/08
Hannah Montana	Standard Character Mark	3,413,552	4/15/08
Lilo & Stitch	Typed Drawing	2,811,097	3/29/01
Pinocchio	Design Plus Words, Letters, and/or Numbers	2,920,964	1/25/05
Cars	Design Plus Words, Letters, and/or Numbers	3358115	12/18/07
Cars	Design Plus Words, Letters, and/or Numbers	3178664	11/28/06
Lightning McQueen	Standard Character Mark	3370157	1/15/08
Mater	Standard Character Mark	3406600	4/1/08
Rust-Eze	Standard Character Mark	3294617	9/18/07
Doc Hudson	Standard Character Mark	3321900	10/23/07
Toy Story	Typed Drawing	2,520,404	12/18/01
Ariel	Standard Character Mark	Serial Number 77,130,150	n/a
Beauty and the Beast	Typed Drawing	2,961,693	6/14/05

Princess Jasmine	Standard Character Mark	Serial Number 77,098,469	n/a
High School Musical	Standard Character Mark	3,506,572	9/23/08
High School Musical	Standard Character Mark	3,433,096	5/20/08
High School Musical	Standard Character Mark	3,420,394	10/24/06
Meet the Robinsons	Standard Character Mark	3,420,082	4/29/08
Meet the Robinsons	Standard Character Mark	3,354,473	12/7/07
The Cheetah Girls	Standard Character Mark	3,252,269	6/12/07
Walt Disney Pictures Presents The Wild	Standard Character Mark	3,389,689	2/26/08
Disney Bolt	Standard Character Mark	3,648,251	6/30/09
Disney Bolt	Standard Character Mark	3,604,222	4/7/09
Wall-E	Standard Character Mark	3,686,824	9/22/09
Wall-E	Standard Character Mark	3,528,986	11/4/08

EXHIBIT E**WARNER BROS.' COPYRIGHTED DESIGNS**

Copyright Registration	Title Of Work (Character)	Type of Work
VA32-457	Tasmanian Devil	Drawing
VA31-867	Sylvester	Stuffed, plush
VA31-868	Bugs Bunny	Stuffed, plush
VA31-869	Tweety	Stuffed, plush
VA31-870	Wile E. Coyote	Stuffed, plush
TXU 550963	Bugs Bunny (1992)	Style Guide
TXU 550472	Sylvester (1992)	Style Guide
TXU 550958	Sylvester Jr. (1992)	Style Guide
TXU 550444	Taz-Mania (1991)	Style Guide
TXU 550812	Tweety (1992)	Style Guide
TXU 550953	Wile E. Coyote (1992)	Style Guide
TXU 550962	Yosemite Sam (1992)	Style Guide
TXU 550471	Acme Road Gear (1992)	Style Guide
TXU-550463	Daffy Duck (1992)	Style Guide
TXU 550960	Elmer Fudd (1992)	Style Guide
TXU 550470	Looney Tunes Guidelines (1992)	Style Guide
TXU 550961	Marc Antony & Pussyfoot (1992)	Style Guide
TXU 550959	Marvin The Martian (1992)	Style Guide
TXU 550957	Pepe Le Pew & Penelope (1992)	Style Guide

TXU 551162	Porky Pig & Petunia Pig (1992)	Style Guide
TXU 550955	Road Runner (1992)	Style Guide
TXU 550964	Speedy Gonzales (1992)	Style Guide
TXU 557335	Tasmanian Devil (1992)	Style Guide
TXU 568671	The Warner Brothers (1992)	Style Guide

EXHIBIT F**WARNER BROS. TRADEMARKS**

Trademark Name	Registration No	Reg. Date
BUGS BUNNY	950381	January 9, 1973
BUGS BUNNY	2046053	March 18, 1997
DAFFY DUCK	1998415	September 3, 1996
ELMER FUDD	1997173	August 27, 1996
LOONEY TUNES	1574797	January 2, 1990
PORKY PIG	2062712	May 20, 1997
ROAD RUNNER	2000037	September 10, 1996
TASMANIAN DEVIL	2033589	January 28, 1997
TWEETY	1997174	August 27, 1996

EXHIBIT G**DC COMICS' COPYRIGHTED DESIGNS**

Copyright Registration	Title of Work (Character)	Type of Work
Txu 1-080-661	DC Comics Anti-Piracy Guide Batman Robin Superman Wonderwoman Supergirl Justice League	Style Guide
RE-627-502	Superman	Prints and pictorial illustrations
TX 5-581-762	Superman	Monthly Publication
TX 3-221-758	Superman	Style Guide
RE-33-050	Superman; comic strip	Periodicals
RE-143-861	Superman wrist watches;	Prints and pictorial illustrations
RE-185-226	Superman--America's greatest adventure character	Books
VA-1-258-002	Superman 2004	calendar
RE-628-242	Batman No. 170, Mar. 1965	Periodicals
TX 5-593-461	Batman	Monthly Publication
RE-628-244	Detective Comics No. 337, Mar. 1965	Periodicals
TX-3-402-770	DC Comics presents Batman 3 D	visual arts
TX-4-183-766	Batman: the terror of two-face	nondramatic literary works, computer programs
TX-5-871-232	The DC Comics guide to writing comics	nondramatic literary works, computer programs
TXu-532-372	DC Comics style guide.	visual arts
VA-776-450	DC Comics Super Heros	visual arts
VA-777-441	DC Comics Super Heroes Paint 'n' Marker book	visual arts
VA-777-593	DC Comics Super Heroes: a giant coloring book.	visual arts
VA-795-718	DC Comics super heroes sticker fun.	visual arts
VA-838-902	DC Comics Super Heroes.	visual arts
VA-854-405	DC Comics Super Heroes, gallery of heroes	visual arts
TX-5-060-774	Batman & Demon	nondramatic literary works, computer programs
VA-839-545	Batman & Mr. Freeze: SubZero-chill out	visual arts
PAu-1-865-982	Batman 3: the final battle	Screenplay

TX-5-626-631	Batman year two: fear the reaper	nondramatic literary works, computer programs
TXu-838-199	Knight Force Batman	Style Guide

EXHIBIT H**DC COMICS' TRADEMARKS**

Trademark	Trademark Registration No.	Trademark Registration Date
Batman	839561 (Serial Number 72256580)	November 28, 1967
Batman	1221720 (Serial Number 73363779)	December 28, 1982
Batman	1,587,507	March 20, 1990
Batman & Rep.	382,770 (Serial Number 71430950)	November 12, 1940
Batman & Rep.	804709 (Serial Number 72218464)	March 1, 1966
Batman & Robin	2,171,937	July 7, 1998
Batman & Robin	2404483 (Serial Number 75301608)	November 14, 2000
Batman Beyond	2,762,067	September 9, 2003
The Batman Rep.	378,913 (Serial Number 71425642)	June 25, 1940
Catwoman	1565883 (Serial Number 73776479)	November 14, 1989
Catwoman	3,181,586	December 5, 2006
Daily Planet	3,018,523	November 22, 2005
Jimmy Olsen	1190637 (Serial Number 73190491)	February 23, 1982
Justice League	1503856 (Serial Number 73684246)	September 13, 1988
Justice League of America	1190681 (Serial Number 73294239)	February 23, 1982
Krypto	1168306 (Serial Number 73213453)	September 8, 1981
Lex Luthor	1634007 (Serial Number 73813018)	February 5, 1991
Lois Lane	1184702 (Serial Number 73190489)	January 5, 1982
Perry White	1184703 (Serial Number 73190490)	January 5, 1982
Robin	1930901 (Serial Number 74521173)	October 31, 1995
S Logo	1173150 (Serial Number 73173809)	October 13, 1981
S Logo	1,197,814	June 15, 1982
S Logo	2,226,415	February 23, 1999

1	Superman	1,175,907	November 3, 1981
2	Superman	1,180,068 (Serial Number 73231845)	December 1, 1981
3	Superman	1,185,526	January 12, 1982
4	Superman	1209668 (Serial Number 73231897)	September 21, 1982
5	Superman	1221718 (Serial Number 73363768)	December 28, 1982
6	Superman in Telescopic	1,200,394	July 6, 1982
7	Superman in Telescopic	371,803 (Serial Number 71410024)	October 10, 1939
8	Superman in Telescopic	1200394 (Serial Number 73231898)	July 6, 1982
9	Superman in Telescopic	2226026 (Serial Number 75432535)	February 23, 1999
10	Superman in Telescopic & Superman w/ Chains Rep.	391,821 (Serial Number 71444138)	November 25, 1941
11	Superman Rep. (Flying Figure)	1200387 (Serial Number 73231895)	July 6, 1982
12	Superman Rep. (Running)	1178048 (Serial Number 73231822)	November 17, 1981
13	Superman Rep. (Running)	1182041 (Serial Number 73231823)	December 15, 1981
14	Superman Rep. (Standing Clenched Fists)	1,200,233	July 6, 1982
15	The Dark Knight	Serial Number 77329797	N/A
16	Wonder Woman	820334 (Serial Number 72237867)	December 13, 1966
17	Wonder Woman	1221717 (Serial Number 73363767)	December 28, 1982

J. Andrew Coombs (SBN 123881)
Nicole L. Drey (SBN 250235)
J. Andrew Coombs, A Prof. Corp.
517 East Wilson Ave., Suite 202
Glendale, California 91206
Telephone: (818) 500-3200
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COPY

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

Sanrio, Inc., Disney Enterprises, Inc., Warner Bros.
Entertainment Inc. and DC Comics,
PLAINTIFF(S)

v.

World Wide Watches, Inc., Ajaz Ramzan a/k/a Ajaz
Razman, Shaheroz Peredina a/k/a Shaeroz Ramzan,
and Does 1-10, inclusive,

DEFENDANT(S).

CASE NUMBER

CV09 07116MRP (SSx)

SUMMONS

TO: THE ABOVE-NAMED DEFENDANT(S):

YOU ARE HEREBY SUMMONED and required to file with this court and serve upon plaintiff's attorney
J. Andrew Coombs, whose address is:

J. Andrew Coombs, A Prof. Corp.
517 East Wilson Ave., Suite 202
Glendale, California 91206

an answer to the ☒ complaint ☐ _____ amended complaint ☐ counterclaim ☐ cross-claim
which is herewith served upon you within 20 days after service of this Summons upon you, exclusive
of the day of service. If you fail to do so, judgement by default will be taken against you for the relief
demanded in the complaint.

Clerk, U.S. District Court

Dated: SEP 30 2009

By: CHRISTOPHER POWERS
Deputy Clerk

(Seal of the Court)